COURTNEY M. PRICE VICE SESSIONE CHEMSTAR



December 18, 2001

Via US Mail and e-mail

Christine Todd Whitman, Administrator U.S. Environmental Protection Agency (EPA) P.O. Box 1473 Merrifield, VA 22116

Re: I

Rubber and Plastic Additives (RAPA) Panel, Consortium No.

HPV Chemical Challenge Program Submission

Hindered Phenols Category

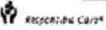
Category Justification and Testing Rationale

Dear Governor Whitman:

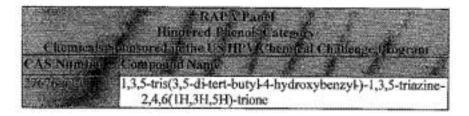
The RAPA Panel of the American Chemistry Council is pleased to submit the subject documents to EPA's HPV Chemical Challenge Program (Program) as our test plan for a category covering eight of the 39 chemicals RAPA is voluntarily sponsoring in the Program. The RAPA Panel includes the following member companies: Bayer Corporation, Ciba Specialty Chemicals Corporation, Crompton Corporation, Flexsys America L.P., The Goodyear Tire & Rubber Company, The Lubrizol Corporation, Noveon, Inc., R.T. Vanderbilt Company, Inc., and UOP, LLC.

In this submission, please find the Category Justification and Testing Rationale for the category Hindered Phenols. Eight chemicals in the category are sponsored in the Program, as listed in the following table:

Chemical CAS Number	RAPA Finel Highered Phenois Category & joursored in the CS-HPA Cheffical Challenge Programs Compound Name
68457-74-9	phenol, isobutylenated methylstyrenated
6:788-44-1	phenol, styrenated
96-69-5	4,4'-thiobis-6-(t-butyl-m-cresol)
85-60-9	4,4'-butylidenebis(6-t-butyl-m-cresol)
79-96-9	phenol, 4,4'-(1-methylethylidene)bis[2,(1,1-dimethylethyl)]-
7786-17-6	phenol, 2,2'-methylenebis(4-methyl-6-nonyl)
68610-5151	phenol, 4-methyl-, reaction products with dicyclopentadiene and isobutylene



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Data for three additional chemicals in the category, listed in the table below, are used to support the conclusions reached for the category.

Just .	BRAP (Panels) e Hantored Phonois Garegory Iditional Chemicals inchie Category
	Compound Same * A * *
128/37/0	2,6-di-tert-butyl-p-cresol
20326.2013	(octadecanoxycarbonylether)phenol
6683-79-8	tetrakis-(methylene-(3,5-di-tertbutyl-4- hydrocinnamate)methane

In addition to the Category Justification and Testing Rationale, please also find attached robust summaries contained in IUCLID-formatted documents for each of the eight sponsored chemicals and the three supporting chemicals in the category.

This submission is also being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov Chem.rtl@epa.gov

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price Vice President, CHEMSTAR

Attachments

Ce: C. Auer, EPA/OPPT

B. Leczynski, EPA/OPPT

RAPA Panel (without attachments)

S. Russell, ACC (without attachments)